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October 14, 2010

By: ECF Filing

Honorable Michael A. Shipp
United States District Court
District of New Jersey
Martin Luther King Building
50 Walnut Street, Room 4015
Newark, NJ 07101

Re: Sperry Associates Federal Credit Union
        v.
        CUMIS Insurance Society, Inc.
        Civil Case No.: 10-00029

Dear Judge Shipp:

This firm represents the plaintiff Sperry Associates Federal Credit Union in the above referenced civil action in the U.S. District Court for the District of New Jersey.

The parties in this matter have already served their First Set of Interrogatories and Document Demands on each other, responses to which were due on or about September 21, 2010. The parties then mutually agreed to extend the time to respond until October 4, 2010.

While plaintiff's counsel was in the process of preparing its responses, some unforeseeable events had taken place which resulted in several changes of plaintiff's management. As a result counsel was bogged down in assisting the plaintiff address legal issues related to these changes. Additionally, the employee of the plaintiff primarily responsible for assisting counsel with the response to demands has resigned.

In light of the foregoing, defendant's counsel was contacted and it was requested that both parties time to respond be extended until October 31, 2010 with subject to the court's approval, the understanding that all previously scheduled discovery dates be pushed back for a period of six weeks. Defendant's counsel has consented to this proposed plan.

Plaintiff respectfully requests that the court approve the proposed extension and schedule modification as proposed by the parties.

I thank you for your consideration of this matter.

Respectfully yours,

SCOTT A. ROSENBERG, P.C.
By:

/s/ Kenneth J. Pagliughi (KJP 4292595)
Kenneth J. Pagliughi, Esq.

cc: Arthur Aizley, Esq. (via ECF notification)